

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CARMEN JOHN PERRI, an individual,

Plaintiff

v.

WEDGEWOOD COURT III ASSOCIATES
LLC, a Washington limited liability
company,

Defendant

Case No. 2:19-cv-00110

**STIPULATION AND
[PROPOSED] ORDER TO
EXTEND DEADLINE FOR
DEFENDANT TO RESPOND
TO COMPLAINT**

NOTE ON MOTION CALENDAR:

FEBRUARY 25, 2019

Plaintiff Carmen John Perri (“Plaintiff”) and defendant Wedgewood Court III Associates, LLC (“Defendant”), by and through their undersigned counsel, hereby stipulate to a 30-day extension of the time for Defendant to answer or otherwise respond to the Complaint [Dkt. No. 1] to further facilitate the prospect of settlement discussions.

The Parties hereby submit that good cause exists for extension of the time for Defendant to answer or otherwise respond to the Complaint, as follows.

1. Plaintiff filed the Complaint on January 24, 2019.
2. Defendant received the Summons and Complaint on February 7, 2019.
3. If properly served, Defendant's response to the Complaint is due on February 28, 2019, pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i).

4. Plaintiff has made a settlement demand, and, to allow Defendant the opportunity to consider the settlement demand, the parties have agreed to a 30-day extension of the deadline for Defendant to respond to the Complaint, to a new deadline of April 1, 2019. The parties agree that the requested extension would facilitate such discussions, by allowing more time before Defendant undertakes the expense of preparing a response to the Complaint.

RESPECTFULLY SUBMITTED this February 25, 2019

/s/ Kit W. Roth

Kit W. Roth, WSBA No. 33059

/s/ R. Omar Riojas

R. Omar Riojas, WSBA No. 35400

GOLDFARB & HUCK ROT

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STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO RESPOND TO COMPLAINT - 2

**GOLDFARB & HUCK
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ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED.

Dated this 26th day of Feb., 2019

James L. Robart
United States District Court Judge

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**STIPULATION AND [PROPOSED] ORDER TO EXTEND
DEADLINE TO RESPOND TO COMPLAINT - 3**

**GOLDFARB & HUCK
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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2019 I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered parties.

DATED this February 25, 2019.

/s/ Kit W. Roth
Kit W. Roth, WSBA No. 33059

**STIPULATION AND [PROPOSED] ORDER TO EXTEND
DEADLINE TO RESPOND TO COMPLAINT - 4**

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